



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: SHANAN CONSUEGRA-PEREZ

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

FOLLOWING A 2018 INVESTIGATION, THE DEPARTMENT SUBSTANTIATED THE FOLLOWING ALLEGATIONS AGAINST MOS CONSUEGRA-PEREZ:

1. FAIL TO PROPERLY SEARCH - VEHICLE - DEPARTMENT VEHICLE
2. FOUND PROPERTY IN DEPARTMENT VEHICLE - CONTROLLED SUBSTANCE

THE MATTER WAS CONCLUDED ON DECEMBER 12, 2018, AFTER MOS CONSUEGRA-PEREZ RECEIVED VERBAL INSTRUCTIONS.

Disclosure # 2:

FOLLOWING A SEPARATE 2018 INVESTIGATION, THE DEPARTMENT SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST MOS CONSUEGRA-PEREZ:

1. OTHER DEPARTMENT RULES/PROCEDURES VIOLATION

THE MATTER WAS CONCLUDED ON DECEMBER 3, 2018, AFTER MOS CONSUEGRA-PEREZ RECEIVED A SCHEDULE 'A' COMMAND DISCIPLINE.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
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